

1 Jason Crews
2 1515 N. Gilbert Rd 107-204
3 Gilbert, AZ 85234
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5 Jason.crews@gmail.com

6 *In propria persona*
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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA
PHOENIX DIVISION

10 Jason Crews,
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12 Plaintiff,
13 v.
14 Tanpri Media & Arts, Inc, *et al.*
15 Defendants.

Case No.: 2:22-cv-02120-SMB

Memorandum in Support of Plaintiff's *Ex Parte* Application for Subpoenas Duces Tecum

Pursuant to Federal Rules of Civil Procedure ("FRCP") Rule 45, 69, and General Order 18-19 ("Order"), Judgment Creditor Jason Crews ("Crews") respectfully moves the court to instruct the Clerk of the court to issue subpoenas duces tecum to obtain evidence which he believes to be in the possession of third parties for the purposes of judgment enforcement against Judgment Debtors. In support thereof, Plaintiff states as follows.

On March 27, 2024, this court entered a default judgement in Crews' favor. FRCP Rule 69 states "In aid of the judgment or execution, the judgment creditor or a successor in interest whose interest appears of record may obtain discovery from any person—including the judgment debtor—as provided in these rules or by the procedure of the state where the court is located."

On May 6, 2024, the Court entered an Order (Doc. 38) granting Plaintiff's prior Application (Doc. 37).

1 Plaintiff now realizes the entity he previously identified as Early Warning Systems,
 2 LLC, and to whom the prior subpoenas (Docs. 39-1 and 39-2) were issued, should have
 3 been Early Warning Services, LLC. All other aspects of Plaintiffs prior request remains the
 4 same.

5 **Early Warning Services, LLC**

6 Early Warning Services, LLC dba Zelle (“Zelle”) maintains an office at 5801 N Pima
 7 Rd, Scottsdale, AZ 85250, <https://maps.app.goo.gl/svuswrrFk65x2R1A7>, which is
 8 approximately 16.2 miles away from Crew’s address 1515 N Gilbert Rd, Gilbert AZ 85234
 9 and less than 100 miles complaint with rule 45(c)(2)(A).

10 Matthew Capozzoli

11 Per a user search on the Zelle payment processing system Capozzoli transacts
 12 business with Zelle. As such, Crews seeks the following from Zelle.

13 1. Please provide the Zelle Consumer Profile and Transaction Search for the
 14 following email address “customer token” associated email addresses:

- 15 • mattcapozzoli@gmail.com

16 2. To the extent not duplicative of Request No. 1, please provide a list of all
 17 Zelle transactions associated with the tokens above from December 9, 2022 to
 18 present.

19 3. To the extent not duplicative of Request No. 1, please provide all bank
 20 account and customer information associated with the Zelle token account(s)
 21 identified, to include, but not limited to, the account holder name, address, SSN, and
 22 linked financial institution, bank account number, and routing number.

23 Elizabeth Beauvil

24 Per a user search on the Zelle payment processing system Elizabeth Beauvil transacts
 25 Zelle. As such, Crews seeks the following from Zelle.

26 1. Please provide the Zelle Consumer Profile and Transaction Search for the
 27 following email address “customer token” associated email addresses:

- 28 • lizb65@gmail.com

29 2. To the extent not duplicative of Request No. 1, please provide a list of all
 30 Zelle transactions associated with the tokens above from December 9, 2022 to
 31 present.

3. To the extent not duplicative of Request No. 1, please provide all bank account and customer information associated with the Zelle token account(s) identified, to include, but not limited to, the account holder name, address, SSN, and linked financial institution, bank account number, and routing number.

Dated this May 10, 2024.

/s/Jason Crews

Jason Crews